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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11 (Lead Case)
(Jointly Administered)

**DECLARATION OF DAVID J.
RICHARDSON IN SUPPORT OF
OPPOSITION OF OFFICIAL
COMMITTEE OF TORT CLAIMANTS'
TO SECURITIES LEAD PLAINTIFF'S
MOTION TO APPLY BANKRUPTCY
RULE 7023 TO CLASS PROOF OF
CLAIM (Dkt. No. 5042)**

Date: January 29, 2020
Time: 10:00 a.m.
Before: Hon. Dennis Montali
United States Bankruptcy Court
Courtroom 17, 16th Fl.
450 Golden Gate Ave.
San Francisco, CA 94102

1 DAVID J. RICHARDSON, under penalty of perjury, declares:

2 1. I am Counsel at Baker & Hostetler LLP, counsel to the Official Committee of Tort
3 Claimants (the “TCC”) of PG&E Corporation and Pacific Gas and Electric Company (the
4 “Debtors”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the TCC’s opposition to the Securities Lead
6 Plaintiff’s Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim [Dkt. No. 5042] (the
7 “Class Claim Motion”).

8 3. Attached hereto as **Exhibit A** is a true and correct copy of the Third Amended
9 Consolidated Class Action Complaint for Violation of the Federal Securities Laws, filed in the
10 United States District Court for the Northern District of California, in Civil Action No. 3:18-cv-
11 03509-EJD.

12 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United*
13 *States of America that the foregoing is true and correct to the best of my knowledge and belief.*

14 Dated: Los Angeles
15 January 14, 2020

/s/ David J. Richardson
David J. Richardson